

**Congress of the United States**  
**Washington, DC 20515**

June 15, 2010

**Via Electronic Mail and Hand Delivery**

Richard Westling, Esq.  
Ober Kaler Grimes and Shriver  
1401 H Street, N.W. Suite 500  
Washington, D.C. 20005

Jonathan Turley, Esq.  
The George Washington University Law School  
2000 H. Street, N.W.  
Washington, D.C. 20052

**Re: Impeachment of Judge G. Thomas Porteous – Discovery**

Dear Counsel:

Enclosed please find an updated Exhibit List and corresponding disc of exhibits. We have added 12 new exhibits, identified below, and we have also amended HP Exhibit 79, to add the witness certification to the end of the deposition transcript of Charlie Kerner. Please note that several of these newly-marked exhibits are documents or materials that Judge Porteous has seen before.

- HP Exhibit 6(c): Judge G. Thomas Porteous Jr.'s Reply Memorandum to the Report by the Fifth Circuit Special Investigatory Committee
- HP Exhibit 19: 12/08/03 FBI Interview of Robert Creely
- HP Exhibit 42: 12/08/03 FBI Interview of Rhonda Danos
- HP Exhibit 48: FBI Surveillance Video Recording (Judge Porteous and others entering and leaving Emerils Restaurant on March 11, 2002)
- HP Exhibit 49:<sup>1</sup> FBI Wiretap Recordings (March 11, 2002 telephone calls by Louis Marcotte to Judge Porteous's chambers re: lunch at Emerils)
- HP Exhibit 89(a)-(d): FBI Interviews of Ronald Bodenheimer
- HP Exhibit 333(a)-(b): Interviews of William Greendyke
- HP Exhibit 343: Documents produced by Claude Lightfoot to Grand Jury

---

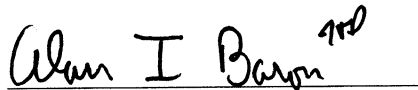
<sup>1</sup> HP Exhibits 48 and 49 are enclosed on separate discs.

In addition, please be advised that upon a further review of documents and materials in the House's possession, the House has identified additional materials – approximately 3 redwelds and some electronic files of FBI spread sheets of financial records – for your inspection.

As we have indicated, we have taken an expansive view of our obligations, and these materials may exceed the requirements of the Special Impeachment Trial Committee's June 9, 2010 Disposition of Discovery Issues. In conjunction with the additional materials on the exhibit list, we believe that with the production of these materials for your inspection (and copying if you desire), we have satisfied our discovery obligations in this case. However, we recognize that discovery obligations are ongoing, and if we identify additional discoverable materials in our possession, we shall inform you promptly of that fact and either provide them to you or permit you to inspect them.

If you have any questions about the updated Exhibit List and disc of exhibits, or the House's document production, please contact Kirsten Konar at 202-828-3526.

Sincerely,

A handwritten signature in black ink that reads "Alan I. Baron" with a stylized flourish at the end.

Alan I. Baron

Special Impeachment Counsel

Enclosures

cc: Derron Parks (via e-mail) (w/o enclosures)  
Tom Jipping (via e-mail) (w/o enclosures)  
Rebecca Seidel (via e-mail) (w/o enclosures)  
Justin Kim (via e-mail) (w/o enclosures)  
Daniel C. Schwartz (via e-mail) (w/o enclosures)